

REMARKS

Favorable reconsideration and allowance of the subject application are respectfully requested. Claims 6-8 and 17-26 are pending in the present application, with claims 6, 7, 17 and 22 being independent. Claims 23-26 have been added by this amendment, which do not add any new subject matter.

Drawings

Applicants note with appreciation the Examiner's indication in item 11 of the Office Action Summary Sheet that the drawing corrections filed on August 1, 2003, have been approved.

The Examiner questions on page 2 of the Office Action why Figs. 29-30 were labeled as "conventional art" rather than "prior art." First, the Examiner never objected to Figs. 29-30. Applicants provided the label "conventional art" in an effort to comply with 37 C.F.R. §1.84. Referring to MPEP §608.05(g) it states that the figures "should be designated by a legend such as --Prior Art--," emphasis added. Referring to page 16 of the present application, it states that Figs. 29 and 30 are diagrams of conventional apparatuses. In sum, the legend "conventional art" fully complies with C.F.R. §1.84.

Formal replacement sheets were submitted on August 1, 2003,

therefore, formal drawings are not required in response to the outstanding Office Action and continued acknowledgment that the drawings are accepted is respectfully requested.

Claim Rejections 35 U.S.C. §103

The Examiner rejected: claims 6-8, 17-18, and 22 under 35 U.S.C. §103(a) as being unpatentable over *Kondo* (US 2003/0043162) in view of *Edge et al.* (US 6,362,808); and claims 19-21 under 35 U.S.C. §103(a) as being unpatentable over *Kondo* in view of *Edge et al.* and further in view of *Adams et al.* (US 5,926,647). These rejections are respectfully traversed insofar as they pertain to the presently pending claims for at least the foregoing reasons.

Kondo is directed to a memory apparatus of a digital video signal for storing color compressed video, the compressed video data representing components of one of three primary colors. *Edge et al.* is directed to a color mapping method that is used in transforming colors between color imaging systems.

Applicants respectfully submit that the alleged combination of *Kondo* and *Edge et al.* fails to substantiate a *prima facie* case of obviousness. More Specifically, the alleged combination of the cited art fails to teach or suggest at least that color characteristic data is outputted that includes a compressed

multidimensional lookup table and (a) an identifier or (b) software for restoring the compressed multidimensional lookup table.

To establish a *prima facie* case of obviousness, three basic criteria must be met: (1) there must be some suggestion of motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art to modify the reference or to combine reference teachings; (2) there must be a reasonable expectation of success; and (3) the prior art reference must teach or suggest all the claim limitations, see *In re Vaeck*, 947 F.2d 48, 20 USPQ2d 1438 (Fed.Cir.1991).

The Examiner alleges that *Kondo* teaches in paragraph 0044 that color characteristic data includes the compressed multidimensional lookup table and an identifier (as recited in claims 6, 17, or 22) or software (as recited in claim 7) for restoring the compressed multidimensional lookup table. Referring to paragraph 0044 of *Kondo*, it is taught that the compressed video data (from the CD-ROM) is restored into three-primary-color data.

Kondo, however, does not produce color characteristic data that includes a compressed multidimensional lookup table and (a) an identifier or (b) software for restoring the compressed multidimensional lookup table. In other words, *Kondo* contains absolutely no teaching that color characteristic data is produced

that includes a compressed multidimensional lookup table and an identifier or software for restoring the compressed multidimensional lookup table.

The Examiner also alleges that Figs. 3 and 4 of *Kondo* teach a multidimensional lookup table compression means. The Examiner, however, then acknowledges that *Kondo* "does not explicitly specify compressing...[a]...multidimensional lookup table." The Examiner, however, cites *Edge et al.* for support thereof, specifically col. 1, lines 55-67. Referring to that cited section of *Edge et al.* it is not taught that a multidimensional lookup table is compressed. *Edge et al.* merely teaches that "gamut mapping typically involves compressing or scaling regions of the color space." In other words, *Edge et al.* teaches that the color response of a source imaging system is transformed (e.g. compressed) into the color gamut of a target device in order to optimize color mapping. Therefore, it should now be apparent that *Edge et al.* also fails to teach the feature of compressing a multidimensional lookup table that is produced by a multidimensional lookup table producing means.

The Examiner also alleges that *Kondo* teaches in paragraph 0008 a multidimensional lookup table producing means. Referring to paragraph 0008 of *Kondo*, which is part of the background section, it is taught that "selected colors are used in a form of a

conversion table that is referred to as a color look-up table (CLUT).” *Kondo*, however, contains absolutely no teaching that the device of *Kondo* produces such a CLUT. *Kondo* merely discloses that a CLUT is used in the prior art and that “when more colors than 256 are required...[that]...this method is insufficient [use of a CLUT].”

Further, Applicants respectfully submit that the CLUT as taught in *Kondo* is not a multidimensional lookup table. Referring to, for example, page 18, lines 14-17, of the present application it is taught that a multidimensional LUT (lookup table) is a LUT “composed of pairs of an input and an output at each of the grid points formed by equally dividing the input side axis.” In contrast thereto, the CLUT as used in *Kondo* is not a multidimensional lookup table. As shown in Fig. 5, *Kondo* uses three one-dimensional LUTs for R, G and B independently.

Dependent claims 8 and 18-21 should be considered allowable at least for depending from an allowable base claim.

Accordingly, in view of the above discussion, Applicants respectfully request that the Examiner withdraw the rejections.

Regarding new dependent claims 23-26, Applicants respectfully submit that the cited prior art fails to teach or suggest at least that the color intensity data of Red, Green, and Blue, which are

included in the characteristic points, are compressed.

Referring to, for example, Fig. 2 and paragraph 43 of Kondo, it can be readily seen that only one of the compressed color data dd(r), dd(g), or dd(b), which are formed at steps S104-S106, respectively, is stored as video data at step S107. Thus, Applicants respectfully request that the Examiner indicate new dependent claims as allowable because the cited art fails to teach or suggest the features claimed therein and/or because they are dependent on allowable base claims.

Conclusion

In view of the above amendments and remarks, this application appears to be in condition for allowance and the Examiner is, therefore, requested to reexamine the application and pass the claims to issue.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact the undersigned at telephone number (703) 205-8000, which is located in the Washington, DC area.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees

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required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

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